

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

REBECCA TERRY,)	
)	
Plaintiff,)	
)	
v.)	No. 17-cv-01112
)	
COUNTY OF MILWAUKEE, <i>et al.</i> ,)	Hon. J.P. Stadtmueller
)	
Defendants.)	JURY TRIAL
)	DEMANDED

**PLAINTIFF’S RESPONSE TO WISCONSIN COUNTY MUTUAL INSURANCE
CORPORATION’S MOTION TO INTERVENE**

Plaintiff, Rebecca Terry, by and through her attorneys, Loevy & Loevy, hereby responds to the motion to intervene filed by the Wisconsin County Mutual Insurance Corporation, stating in support as follows:

1. Wisconsin County Mutual Insurance Corporation (“WCMIC”) has moved to intervene in this case, on the grounds that Defendant Morgan Bevenue, who is an insured under one or more policies issued by WCMIC, has been nonresponsive to defense counsel appointed by WCMIC. *See* Dkt. Nos. 52, 53.

2. Without taking a position on the merits of any arguments that WCMIC might make as to why it believes Bevenue is not entitled to a defense or indemnification by WCMIC in this lawsuit, Plaintiff does not oppose WCMIC’s motion to intervene. Plaintiff reserves all rights with respects to any substantive arguments that WCMIC might make if the Court grants it leave to intervene.

Respectfully submitted,

/s/ Scott Rauscher

Arthur Loevy
Jon Loevy
Scott Rauscher
Theresa Kleinhaus
Aisha N. Davis
LOEVY & LOEVY
311 N. Aberdeen, Third Floor
Chicago, IL 60607
(312) 243-5900
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Scott Rauscher, an attorney, certify that on March 26, 2018, I caused the foregoing to be filed using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Scott Rauscher
Scott Rauscher
One of Plaintiff's Attorneys